

# EXHIBIT C

Thursday, June 27, 2019 at 5:49:51 PM Eastern Daylight Time

**Subject:** Fwd: Hannah Paull's Training File  
**Date:** Wednesday, June 19, 2019 at 4:56:18 PM Eastern Daylight Time  
**From:** sarah watts  
**To:** eric@nsldn.org

Hannah and other students were sent this response. They would like to know how to respond to this email.

Thank you,  
Sarah Watts  
Sent from my iPhone

Begin forwarded message:

**From:** Hannah Paull <[hpaul@bu.edu](mailto:hpaul@bu.edu)>  
**Date:** June 19, 2019 at 3:40:57 PM CDT  
**To:** sarah watts <[sarwatts@yahoo.com](mailto:sarwatts@yahoo.com)>  
**Subject:** Fwd: Hannah Paull's Training File

----- Forwarded message -----

**From:** Berkson, Hugh D. <[hdb@mccarthylebit.com](mailto:hdb@mccarthylebit.com)>  
**Date:** Wed, Jun 19, 2019 at 4:14 PM  
**Subject:** RE: Hannah Paull's Training File  
**To:** Hannah Paull <[hpaul@bu.edu](mailto:hpaul@bu.edu)>  
**CC:** Mary K Whitmer <[mkw@weadvocate.net](mailto:mkw@weadvocate.net)>, Mr. Charles A Dottore <[charlie@dottoreco.com](mailto:charlie@dottoreco.com)>

Ms. Paull,

Thank you for your inquiry.

As you know, certain files were destroyed in Georgia. I'm pleased to tell you, however, that certain files were preserved and are now in the Receiver's possession in Cleveland. The Receiver's staff is in the process of inventorying those records so we can determine what, exactly, he has. In all likelihood, if we find any records for you in those transferred to the Receiver's offices, the records will be "student files," not your "training files." In English, that means I expect that any records we find would most likely be copies of your enrollment paperwork, disclosures, financial aid documentation, and disciplinary records (if any). I do not expect to find records of your clinical hours, academic records, or evaluations. Regardless, I'm happy to let you know what the files contain as soon as I know. And, to the extent you want a copy of whatever we find on your behalf, we're happy to provide that copy.

To the extent you're trying to obtain copies of training files for purposes of licensure, I understand that the destroyed files can be recreated, though some effort will be required:

**Clinical Hours:** If you did not keep your own log of your clinical hours, they were recorded in Time to Track. You must log into your Time to Track account to recover those records.

**Academic Documents:** There is no particular electronic file dedicated to you alone. Thus, we cannot simply go in and pull a file for you. If there are particular records you require, please let me know and we will attempt to have those records recovered from the Image Now database, and sent to you via email.

**Evaluations:** If you did not keep copies of your evaluations, you will have to contact the people and/or institutions under whom you worked and ask for copies of those evaluations from them.

I will let you know which of your records were found, if any, in the Receiver's offices as soon as the staff so informs me. That said, I have asked that staff give the search for your records their immediate attention. Otherwise, if there are particular documents you need that are not addressed above (or particular academic documents), please tell me and we'll do what we can to work with you to find a solution to the problem.

-Hugh Berkson

**Hugh D. Berkson** ▪ Principal ▪ McCarthy, Lebit, Crystal & Liffman Co., LPA

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**Confidentiality Notice to Incorrect Addressee:** <http://www.mccarthylebit.com/confidential-communication/>

**From:** Hannah Paull <[hpaul@bu.edu](mailto:hpaul@bu.edu)>

**Sent:** Thursday, June 13, 2019 6:05 PM

**To:** Berkson, Hugh D. <[hdb@mccarthylebit.com](mailto:hdb@mccarthylebit.com)>

**Subject:** Hannah Paull's Training File

Hi Hugh Berkson,

My name is Hannah Paull. I was previously a student at Argosy Atlanta, GA and have now transferred to The Chicago School of Professional Psychology in Washington D.C. I am requesting information regarding whether or not my training file has been preserved, and, if so, is it still in the possession of the Receiver? If these records cannot be located, I ask that I be provided with information as to who can assist me with providing information to The Chicago School as to how my training file can be developed and put on record. I will certainly need to take this record to future internships and licensing agencies to further my career. I further request for an official letter describing exactly what happened to these files, including whether or not they were destroyed, emphasizing that it was at no fault of my own, a student facing the consequences of Argosy's closure.

Thank you for your time and consideration,

Hannah Paull

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Hannah Paull, M.A.

Doctoral Student

(404) 375-3328

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Hannah Paull, M.A.

Doctoral Student